FACT SHEET FOR NPDES PERMIT NO. WA0001864
CONCRETE TECHNOLOGY CORPORATION

Permit Type:
National Pollutant Discharge Elimination System (NPDES)

Permit Number:
WA0001864

Permittee:
Concrete Technology Corporation
1123 Port of Tacoma Road
P.O. Box 2259
Tacoma, Washington 98401

Permitting Authority:
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

SUMMARY

The permitting authority has made a tentative decision to issue a new permit, effective through June 30, 2004, to Concrete Technology Corporation for the discharge to the Blair Waterway in Commencement Bay at Tacoma, Washington, of process wastewaters, non-process wastewaters and stormwater associated with the activity. The tentative decision to issue the permit is based on a determination that two necessary conditions are fulfilled: (1) that the minimum treatment/control criteria established by the best professional judgement of the permit writer are achievable with the technologies and management practices in place or proposed and (2) that the discharge under these technology-based controls would not have a reasonable potential to cause or contribute to violations of any receiving water quality standards or the characteristic uses of the receiving water. The draft permit should accompany this fact sheet.

The purpose of this fact sheet is to present the facts and reasoning on the basis of which the tentative decision was made.

PUBLIC INVOLVEMENT OPPORTUNITY

Interested persons are invited to comment on this tentative decision. Comments on the draft permit will be received for 30 days following the day of publication of the notice in the local newspaper, *The Tacoma News-Tribune*. (The target date for publication is January 8, 2000).

All written comments submitted during the comment period will be retained by the permitting authority and considered in making the final decision on the application for a permit. The permitting authority will provide copies of the application, the tentative decision and the fact sheet on request. Persons who submit written comments will be notified of the final decision.

The applicant or anyone affected by or interested in the tentative decision may request a public hearing. The request must be filed within the 30-day comment period, and must indicate the interest of the party filing such a request and the reasons why a hearing is warranted. The permitting authority will hold a public hearing if it determines there is sufficient public interest.

Please submit written comments to the permitting authority at the above address, to the attention of Industrial Permit Coordinator.

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INTRODUCTION

The Federal Clean Water Act (FCWA, 1972, and later modifications, 1977, 1981, and 1987) established water quality goals for the navigable (surface) waters of the United States. One of the mechanisms for achieving the goals of the Clean Water Act is the National Pollutant Discharge Elimination System (NPDES) of permits, which is administered by the Environmental Protection Agency (EPA). The EPA has delegated responsibility to administer the NPDES permit program to the state of Washington on the basis of Chapter 90.48 Revised Code of Washington (RCW) which defines the Department of Ecology's (Department) authority and obligations in administering the wastewater discharge permit program.

The regulations adopted by the state include procedures for issuing permits [Chapter 173-220 Washington Administrative Code (WAC)], water quality criteria for surface and ground waters (Chapters 173-201A and 200 WAC), and sediment management standards (Chapter 173-204 WAC). These regulations require that a permit be issued before discharge of wastewater to waters of the state is allowed. The regulations also establish the basis for effluent limitations and other requirements which are to be included in the permit. One of the requirements (WAC 173-220-060) for issuing a permit under the NPDES permit program is the preparation of a draft permit and an accompanying fact sheet. Public notice of the availability of the draft permit is required at least thirty days before the permit is issued (WAC 173-220-050). The fact sheet and draft permit are available for review (see Appendix A--Public Involvement of the fact sheet for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised.

GENERAL INFORMATION	
Applicant:	Concrete Technology Corporation
Facility Name and Address:	1123 Port of Tacoma Road Tacoma, Washington
Type of Facility:	Concrete Products Manufacturing
SIC Code:	3272
Discharge Location:	Waterbody name: Inner Commencement Bay (Blair Waterway) Latitude: 47° 16' 00" N Longitude: 122° 24' 00" W
Water Body ID Number:	WA-10-0020

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

LOCATION

Concrete Technology Corporation is located on 30 acres in the port area of the City of Tacoma along the Blair Waterway, Commencement Bay, a zone of heavy industry and shipping.

INDUSTRIAL PROCESS

The applicant fabricates pre-cast and pre-stressed reinforced concrete structural and (to a much lesser extent) architectural products. Production volume is approximately 1,000 cubic yards per week. Raw materials are aggregates, Portland cement, water, steel, form release oils and various concrete admixtures. Forms are prepared, reinforcing set, and concrete, mixed at two batch plants on the site, is conveyed to the forms by special transport vehicles. Forms are removed and the concrete is atmospherically cured and finished. No steam curing is employed. Sawing is part of the process for one product, hollow-core flooring. Forms are cleaned mechanically for the most part. Pre-stressed products require the additional step of pre-tensioning the reinforcing steel.

SOURCES OF WATERBORNE POLLUTANT DISCHARGES

Process Waters:

Process water is defined as that water which, during the manufacturing process, comes into direct contact with any raw material, intermediate product, product, byproduct or waste used in or resulting from the process.

The water used as an ingredient in the making of concrete is process water, but it remains with the product.

Water is used for washing transport machinery buckets and central batch mixers and forms. It is also used for spray curing and finishing. These are process waters because they are used in the process and come into contact with raw materials or products, and these are the major sources of process wastewater from this manufacturing activity.

Other uses of water are: keeping aggregate saturated, controlling dust and, for architectural purposes, the occasional spraying of product surfaces to expose aggregate. These uses are relatively small and are to a large extent absorbed into the product, evaporated and infiltrated.

The applicant estimates that 10,000 gallons per week of process waste water discharge is generated from all process activities.

Five admixtures are used in the concrete mixes, as needed. These include lignum sulfate, which reduces the amount of water needed and increases hardness, and additives that inhibit corrosion. The facility is currently experimenting with “Adva” another additive that would substitute for the sulfate-based admixture. All the admixtures are stored in tanks near the respective manufacturing areas. The facility also uses oil as a form release aid. Cleaning of the forms is primarily a dry process (chipping) with no washing. The nature, quantity and potential for release of these materials pose no toxic or other threat to the uses and standards of the receiving water.

Non-process Waters:

Non-process water is defined as that used for auxiliary operations necessary for the manufacture of a product but not contacting the process materials. (For examples: non-contact cooling water, boiler water.) There are no non-process waters. Compressors are air-cooled. There are no steam boilers, and therefore no steam loss and consequent need for "blowdown". Hot-water radiant heating systems for product curing recycle water with no losses.

Storm Water Runoff:

The other source of pollutant discharges is the storm water runoff from the areas associated with the industrial activity (including those areas of raw material and product storage). The pollutants discharged with this storm water would be similar in nature to those in the process water, the amounts being dependent on the intensity and duration of the rainfall, and the cleanliness of the site at the time of the rainfall.

Groundwater Seepage:

Groundwater seepage from the graving dock walls, while not a "wastewater", enters the settling trough and adds to the total discharge flow from the site outfall. Out of a minimum of about 300,000 gallons per day which passes through the flow meter and up to one million gallons per day or more, only 5000 to 10,000 is estimated to be process wastewater. The remainder is rainwater runoff and ground water seepage.

Other Wastewaters:

Sanitary sewage and discharges from the vehicle maintenance area are discharged to the City of Tacoma sanitary sewer system.

POLLUTION CONTROL MEASURES

Treatment:

At the areas where mixing and conveying equipment are washed, small settling basins (with sloped bottoms to make them accessible by machinery to remove the settled materials) have been constructed to capture the larger, heavier particles. These basins overflow or are pumped to a site drainage system which conveys this settled washwater, along with any stormwater runoff, to a settling trough at the graving dock, where these waters mix with ground water seepage at the dock. The dock, originally built for ship maintenance, is now used only occasionally by CTC for construction and launching of floating concrete structures. The trough at the graving dock acts as a settling tank where further removal of suspended solids in the wastewater is accomplished. This treatment strategy was proposed in an engineering report and that report was approved by the Department during the previous permit term, prior to its construction.

The discharge pipe contains an in-line pH probe and pH control (acid injection) equipment that has not been used since it has been found that pH adjustment has not been needed to meet permit limits. The pH of the wastewater has stayed near neutral, with little variation. The settling basin and the discharge pipe are each equipped with a pH probe. At the time of the last inspection, both the probes indicated a pH of 7.3.

Source Controls - "Best Management Practices":

Pollution control measures include berming to contain and control runoff and weekly sweeping of the entire paved area to minimize the transport of fine cement and aggregate particles to the waterway.

The main settling trough and the various settling and catch basins for storm water and process wastewater are cleaned once a month. To prevent discharge from the settling basin during cleanup operations, a concrete lined "pond" has been constructed near the graving dock. This pond receives the discharge from the settling pond during cleaning operations. The pond is emptied back into the settling tank once cleaning operations have been completed.

Reuse:
Water is not currently reused. There is resistance to reuse for concrete mixing because of adverse quality impact concerns, but there is no reason, in principal, why wash water could not be reused. It would involve some capital investment, however. Individual systems would have to be created at each wash site, or a central one with collection and distribution systems, so it would be a matter of economics. This measure may not be reasonable to impose as "AKART", since this is probably not the major contributor to the discharge of solids from the site - that being storm water runoff.

DISCHARGE OUTFALL

There is one outfall carrying the mix of stormwater runoff and the process wastewater discharges, as well as ground water seepage into the graving dock, to Blair Waterway. The wastewater is discharged from the settling basin via a float-triggered pump. The outfall is a single port PVC pipe located on the bank and discharging above the water level of the Waterway.

PERMIT STATUS

The previous permit for this facility was issued on February 26, 1993 with an expiration date of February 26, 1998. An application for permit renewal was submitted to the Department on September 5, 1997. After some corrections of errors and omissions, the application was accepted by the Department on July 16, 1998. On the basis of this application and in accordance with provisions of state and federal regulations, the last permit has been allowed to continue in effect until a final permit decision is made.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

EFFLUENT LIMITS
The previous permit placed final effluent limitations on turbidity, oil and grease, settleable solids and pH. In the last three years there have been no excursions beyond pH and Oil & Grease limits reported. There have been reported 2 exceedences (out of 36) of the maximum monthly average turbidity effluent limit and 3 (out of 144) of the maximum daily average turbidity limit, and one (out of 144) of the settlable solids limit. One of the maximum daily average turbidity limit violations and the single settleable solids violation were artificially caused by a sediment removal operation. There have been no excursions beyond any effluent limits since July 1997. The following table summarizes the reported monitoring results for the three-year period from July 1996 through June 1999.

Parameter	Range	Limits	Excursions / Samples
Turbidity, avg. monthly	1 - 34	18 mg/L	2 / 36
Turbidity, avg. daily		24 mg/L	3 / 144
Settleable solids, avg. daily		0.1 mg/L	1 / 144
pH, min.	6.5	6.5	0
pH, max.	7.6	9.0	0
Oil & Grease (avg.), mg/L	<0.5 - 2.5	10 mg/L	0
Oil & Grease (max.), mg/L	<0.5 - 7.8	15 mg/L	0

OTHER SPECIAL CONDITIONS
The required monitoring parameters and frequencies of special condition S2 have been maintained through the term of the permit.

Special Condition S3, Reporting and Record-keeping: Discharge monitoring reports have been submitted monthly through the term of the permit and the reporting and record-keeping requirements are met.

Whole effluent toxicity testing has been performed in compliance with permit conditions S5 and S6. Acute and chronic testing frequencies have been reduced to once per year based on the results of earlier testing which satisfied the performance standards of toxicity (i.e., the testing revealed no significant toxicity). The state's strategy for meeting EPA whole effluent toxicity requirements has changed since the current permit was issued.

An updated spill control plan was submitted may 16, 1994, in compliance with special condition S7.

A treatment system operation and maintenance manual was submitted April 28, 1994, in compliance with special condition S8.

CTC has implemented the best management practices specified by special condition S9 and additional BMP's not specified (described in a letter to the department dated march 15, 1996) in the effort to meet effluent limits for turbidity and settleable solids.

The single-point discharge mandated by special condition S10 was accomplished by December 2, 1993, approximately six months after the scheduled compliance date.

GENERAL CONDITIONS
There has been satisfactory compliance with the general conditions of the permit.

COMPLIANCE INSPECTION SUMMARY
The facility last received an inspection on June 18, 1998. The only deficiency noticed was that secondary containment for concrete additive containers was lacking. This deficiency has reportedly been since corrected.

WASTEWATER CHARACTERIZATION
The discharge is characterized in the application, according to application requirements, as follows.

Pollutant	Maximum Value	Average of Values	Units	No. of Samples
BOD5	4.2	-	mg/L	2
COD	125	-	mg/L	2
TOC	(waived)			
TSS	17	-	mg/L	2
Ammonia (as N)	0.33	-	mg/L	2
Flow	0.468*	-	MGD	30
Temperature	(waived)			
pH	6.9/7.4			?
Oil & Grease	0.1	-	mg/L	4
Zinc	.052	-	mg/L	2

*The discharge flow has actually ranged to as high as 1.2 million gallons per day during the term of the permit, according to discharge monitoring reports.

No other pollutants on the permit application lists were believed present according to applicant.

The whole effluent toxicity characterizations performed as a condition of the current permit have shown that the effluent has no acute or chronic toxicity potential to aquatic life.

SEPA COMPLIANCE

This is a permit reissuance for an existing discharge and as such is exempt from threshold determination and EIS requirements, per WAC 197-11-850.

PROPOSED PERMIT LIMITATIONS

Federal and State regulations require that effluent limitations set forth in a NPDES permit must be either technology- or water quality-based. Technology-based limitations are based upon the treatment methods available to treat specific pollutants. Technology-based limitations are set by regulation or developed on a case-by-case basis (40 CFR 125.3, and Chapter 173-220 WAC). Water quality-based limitations are based upon compliance with the Surface Water Quality Standards (Chapter 173-201A WAC), Ground Water Standards (Chapter 173-200 WAC), Sediment Quality Standards (Chapter 173-204 WAC) or the National Toxics Rule (Federal Register, Volume 57, No. 246, Tuesday, December 22, 1992). The more stringent of these two limits must be chosen for each of the parameters of concern. Each of these types of limits is described in more detail below.

The limits in this permit are based in part on information received in the application. The effluent constituents in the application were evaluated on a technology- and water quality-basis. The limits necessary to meet the rules and regulations of the state of Washington were determined and included in this permit. The Department does not develop effluent limits for all pollutants that may be reported on the application as present in the effluent. Some pollutants are not treatable at the concentrations reported, are not controllable at the source, are not listed in regulation, and do not have a reasonable potential to cause a water quality violation. If significant changes occur in any constituent, as described in 40 CFR 122.42(a), the Permittee is required to notify the Department.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

Some effort was made by EPA to develop effluent guidelines for the concrete products industry. Data was gathered from many of the facilities in the concrete products industry across the country, and economic evaluations of existing and potential treatment technologies were made. However, no categorical effluent guidelines were ever promulgated in federal regulations. Technologies used by the pre-cast and pre-stressed concrete products industries at the time of the EPA survey were settling (to removed suspended solids) and, occasionally, pH control. Though oil was seen as a potential pollutant, testing during the survey revealed that oil discharges from concrete products industries were not significant, even without any oil removal provisions.

The effluent limits in this draft permit take into consideration the pollutants of concern identified by the EPA effluent guidelines study. They are: suspended solids, pH, and oil.

Discharge monitoring required by the current permit has shown that oil & grease discharges are well below the previously-determined technology-based permit limits. The permitting authority has decided that there is no reason to continue the limit for or monitoring of oil and grease.

The previously-determined technology-based pH limits are 6.5 to 9.0. Monitoring during the current term has shown that a narrower range of pH limitation can be reliably met without any control measures. (See summary table in a previous section). Since pH is a receiving water quality criterion, a more stringent pH limitation range has been imposed, based on this performance.

Suspended solids were limited indirectly in the current permit by placing technology-based limits on "turbidity" and "settleable solids", as assessed by standard tests. These limits are redundant in that they are aimed at the same thing. As a previous section of this fact sheet shows both were exceeded only on rare occasion, and neither have been exceeded for more than two years now. On this basis, the current technology-based turbidity limits, which were based on a calculation of the performance capability of the treatment applied, are deemed to be appropriate and achievable and are continued in this draft permit. The redundant settleable solids limit is discontinued.

SURFACE WATER QUALITY-BASED EFFLUENT LIMITATIONS

In order to protect existing water quality and preserve the designated beneficial uses of Washington's surface waters, WAC 173-201A-060 states that waste discharge permits shall be conditioned such that the discharge will meet established Surface Water Quality Standards. The Washington State Surface Water Quality Standards (Chapter 173-201A WAC) is a state regulation designed to protect the beneficial uses of the surface waters of the state. Surface water quality-based effluent limitations may be based on an individual waste load allocation (WLA) or on a WLA developed during a basin wide total maximum daily loading study (TMDL).

NUMERICAL CRITERIA FOR THE PROTECTION OF AQUATIC LIFE

"Numerical" water quality criteria are numerical values set forth in the State of Washington's Water Quality Standards for Surface Waters (Chapter 173-201A WAC). They specify the levels of pollutants allowed in a receiving water while remaining protective of aquatic life. Numerical criteria set forth in the Water Quality Standards are used along with chemical and physical data for the wastewater and receiving water to derive the effluent limits in the discharge permit. When surface water quality-based limits are more stringent or potentially more stringent than technology-based limitations, they must be used in a permit.

NUMERICAL CRITERIA FOR THE PROTECTION OF HUMAN HEALTH

The U.S. EPA has promulgated 91 numeric water quality criteria for the protection of human health that are applicable to Washington State (EPA 1992). These criteria are designed to protect humans from cancer and other disease and are primarily applicable to fish and shellfish consumption and drinking water from surface waters.

NARRATIVE CRITERIA

In addition to numerical criteria, "narrative" water quality criteria (WAC 173-201A-030) limit toxic, radioactive, or deleterious material concentrations below those which have the potential to adversely affect characteristic water uses, cause acute or chronic toxicity to biota, impair aesthetic values, or adversely affect human health. Narrative criteria protect the specific beneficial uses of all fresh (WAC 173-201A-130) and marine (WAC 173-201A-140) waters in the state of Washington.

ANTI-DEGRADATION

The State of Washington's Anti-degradation Policy requires that discharges into a receiving water shall not further degrade the existing water quality of the water body, in terms of its characteristic or designated uses. When the natural conditions of a receiving water are of higher quality than the criteria assigned, the numeric criteria assigned shall be construed as anti-degradation criteria, since they will maintain the designated or characteristic uses. In cases where the natural conditions of a receiving water are of lower quality than the numeric criteria assigned, the natural conditions shall constitute the numeric water quality

criteria. More information on the State Antidegradation Policy can be obtained by referring to WAC 173-201A-070.

CRITICAL CONDITIONS

Surface water quality-based limits are derived for the waterbody's critical condition, which represents the receiving water and waste discharge condition with the highest potential for adverse impact on the aquatic biota, human health, and existing or characteristic water body uses.

MIXING ZONES

The Water Quality Standards allow the Department to authorize mixing zones around a point of discharge in establishing surface water quality-based effluent limits. Both "acute" and "chronic" mixing zones may be authorized for pollutants that can have a toxic effect on the aquatic environment near the point of discharge. The concentration of pollutants at the boundary of these mixing zones may not exceed the numeric criteria for that type of zone. In the absence of any other defined method for determining the average exposure concentration for human health criteria, the department has determined that these criteria must be met within the zone of allowable exceedance of chronic aquatic life toxicity criteria. This zone is also interpreted by the department to be the maximum allowable exceedance area for other criteria, not necessarily based on toxicity.

DESCRIPTION OF THE RECEIVING WATER

The facility discharges to inner Commencement Bay which is designated as a Class B receiving water in the vicinity of the outfall. Designated uses include the following:

water supply (industrial), fish migration; fish and shellfish rearing, spawning and harvesting; wildlife habitat; secondary contact recreation; sport fishing; boating and aesthetic enjoyment; commerce and navigation. Water quality of this class shall meet or exceed the requirements for most of these designated uses.

SURFACE WATER QUALITY CRITERIA

Receiving water criteria are defined in Chapter 173-201A WAC and U.S. EPA's promulgated human health criteria for toxic pollutants (EPA 1992). Criteria relevant to the pollutants in this discharge are summarized below:

pH	7.0 to 8.5 standard units
Turbidity	less than 10 NTU above background

CONSIDERATION OF EFFLUENT LIMITS BASED ON SURFACE WATER QUALITY CRITERIA

The proposed discharge, at the technology-based limits established in the draft permit, may itself exceed water quality criteria for minimum pH and maximum turbidity. As provided for in WAC 173-220, a limited mixing zone is authorized within which the water quality criteria for any pollutants in this discharge including (but not limited to) turbidity and pH do not apply. The degree of mixing within this limited zone (200 feet from the discharge point) has been determined to be sufficient such that there is no reasonable potential that the discharge will cause or contribute to violation of the water quality criteria for pH or turbidity. The maximum turbidity increase possible at the permit limit is 24 NTU (with no dilution and no receiving water turbidity). With a dilution factor of 2.4, the discharge would not cause a violation of the receiving water quality standard for turbidity increase (10 NTU). Experience has shown that this level of dilution will be attained without question within a distance 200 feet. The pH impact is more

complex, but experience with other discharges to marine waters has shown that there is a buffering effect, in addition to the effect of dilution, on discharges with sub-neutral pH.

WHOLE EFFLUENT TOXICITY

The Water Quality Standards for Surface Waters require that the effluent not cause toxic effects in the receiving waters. Many toxic pollutants cannot be detected by commonly available detection methods. However, toxicity can be measured directly by exposing living organisms to the wastewater in laboratory tests and measuring the response of the organisms. Toxicity tests measure the aggregate toxicity of the whole effluent, and therefore this approach is called whole effluent toxicity (WET) testing. Some WET tests measure acute toxicity and other WET tests measure chronic toxicity.

Acute toxicity tests measure mortality as the significant response to the toxicity of the effluent. Dischargers who monitor their wastewater with acute toxicity tests are providing an indication of the potential lethal effect of the effluent to organisms in the receiving environment.

Chronic toxicity tests measure various sublethal toxic responses such as retarded growth or reduced reproduction. Chronic toxicity tests often involve either a complete life cycle test of an organism with an extremely short life cycle or a partial life cycle test on a critical stage of one of a test organism's life cycles. Organism survival is also measured in some chronic toxicity tests.

Accredited WET testing laboratories have the proper WET testing protocols, data requirements, and reporting format. Accredited laboratories are knowledgeable about WET testing and capable of calculating an NOEC, LC_{50}, EC_{50}, IC_{25}, etc. All accredited labs have been provided the most recent version of the Department of Ecology Publication # WQ-R-95-80, *Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria* which is referenced in the permit. Any Permittee interested in receiving a copy of this publication may call the Ecology Publications Distribution Center 360-407-7472 for a copy. Ecology recommends that Permittees send a copy of the acute or chronic toxicity sections(s) of their permits to their laboratory of choice.

The WET tests during effluent characterizations in the current permit term indicate that no reasonable potential exists to cause receiving water toxicity. The Permittee may be required to retest the effluent at the time of application for future permit renewal for toxicity.

If the Permittee makes process or material changes which, in the Department's opinion, results in an increased potential for effluent toxicity, then the Department may require additional effluent characterization in a regulatory order, by permit modification, or in the permit renewal. Toxicity is assumed to have increased if WET testing conducted for submission with a permit application fails to meet the performance standards in WAC 173-205-020, "whole effluent toxicity performance standard". The Permittee may demonstrate to the Department that changes have not increased effluent toxicity by performing additional WET testing after the time the process or material changes have been made.

SEDIMENT QUALITY

The Department has promulgated aquatic sediment standards (Chapter 173-204 WAC) to protect aquatic biota and human health. These standards state that the Department may require Permittees to evaluate the potential for the discharge to cause a violation of applicable standards (WAC 173-204-400).

The Department has determined through a review of the discharger characteristics and effluent characteristics that this discharge has no reasonable potential to violate the Sediment Management Standards.

COMPARISON OF EFFLUENT LIMITS

Existing Limits		Proposed Limits	
Turbidity, NTU	24 max. / 18 avg.	Turbidity, NTU	24 max. / 18 avg.
Settleable Solids, ml/L	0.1		
pH	6.0 - 9.0	pH	6.5 - 8.5
Oil & Grease	15 max. / 10 avg.		

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are required (WAC 173-220-210 and 40 CFR 122.41) to verify that the treatment process is functioning correctly and the effluent limitations are being achieved.

The monitoring schedule is detailed in the proposed permit under Condition S.2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3. are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 273-220-210).

TREATMENT SYSTEM OPERATING PLAN
In accordance with state and federal regulations, the Permittee is required to take all reasonable steps to properly operate and maintain the treatment system (40 CFR 122.41(e)) and WAC 173-220-150 (1)(g).

GENERAL CONDITIONS

General Conditions are based directly on state and federal law and regulations and have been standardized for all individual industrial NPDES permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control its production in order to maintain compliance with its permit. Condition G10 prohibits the reintroduction of removed substances back into the effluent. Condition G11 states that the Department will modify or revoke and reissue the permit to conform to more stringent toxic effluent standards or prohibitions. Condition G12 incorporates by reference all other requirements of 40 CFR 122.41 and 122.42. Condition G13 notifies the Permittee that additional monitoring requirements may be established by the Department. Condition G14 requires the payment of permit fees. Condition G15 describes the penalties for violating permit conditions.